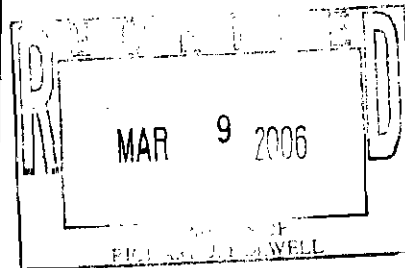


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHELE SNOW, Individually and On
Behalf Of All Others Similarly Situated,

Plaintiffs,

- against -

DOUBLEDAY, a division of RANDOM HOUSE, INC.;
BANTAM DOUBLEDAY DELL PUBLISHING GROUP;
RANDOM HOUSE, INC.; ANCHOR BOOKS, a division
of RANDOM HOUSE, INC.; JAMES FREY,

Defendants.
-----X

06 CV 00669 (RJH) (MHD)

STIPULATION AND ORDER

WHEREAS, the above-captioned action is one of eleven actions pending in federal courts across the country that arises out of the publishing and marketing of the book "A Million Little Pieces" (the "Book"), written by defendant James Frey (the "AML P Actions") and that on February 23, 2006 defendant Random House, Inc. ("Random House") filed with the Judicial Panel on Multidistrict Litigation ("JPML") a motion to transfer and consolidate the AML P Actions for coordinated pretrial proceedings (the "MDL Motion");

IT IS HEREBY STIPULATED AND AGREED, by and between the parties¹ through their undersigned counsel, that in light of the MDL Motion and in order to preserve the resources of the Court and litigants and avoid inconsistent pretrial rulings in the AML P Actions, all

¹ In addition to defendants Random House and James Frey, the complaint purports to name as defendants "Doubleday, a division of Random House, Inc.", "Bantam Doubleday Dell Publishing Group" and "Anchor Books, a division of Random House, Inc.", none of which are separate corporate entities. Doubleday, Bantam Doubleday Dell Publishing Group and Anchor Books are divisions of Random House, Inc. Defendant Random House will move at the appropriate time to have these alleged parties dismissed from the action.

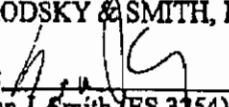
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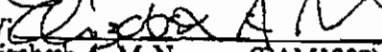
proceedings in the above-captioned action shall be stayed pending a final determination of the
MDL Motion.

Dated: New York, New York
March 3, 2006

BRODSKY & SMITH, LLC

By: 
Evan L. Smith (ES 3254)
240 Mineola Boulevard, First Floor
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Michele Snow, et al.

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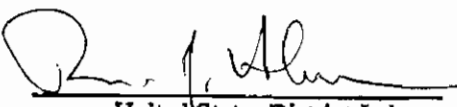
By: 
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Attorneys for Defendant
Random House, Inc.

MCDERMOTT WILL EMERY LLP

By: _____
Ann E. Schofield (AS 6832)
340 Madison Avenue
New York, New York 10017
(212) 547-5400
Attorneys for Defendant James Frey

IT IS SO ORDERED:

3/8/06
Date


United States District Judge

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212 5475830 P.03

proceedings in the above-captioned action shall be stayed pending a final determination of the

MDL Motion.

Dated: New York, New York
March __, 2006

BRODSKY & SMITH, LLC

By: _____
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By: _____
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(212) 489-8230
Attorneys for Defendant
Random House, Inc.

IT IS SO ORDERED:

Date

United States District Judge